



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

**ELECTRONIC MAIL**

March 24, 2021

Jolanta Ozatalay  
Regulatory Affairs Project Manager  
Fine Agrochemical LTD  
12733 Director's Loop  
Woodbridge, VA 22192

Subject: NAA: AMVAC Request that EPA Review Required Data for 1-Naphthaleneacetic Acid Technical Sodium Salt (EPA Reg. No. 62097-35) and 1-Naphthaleneacetic Acid Technical Potassium Salt (EPA Reg. No. 62097-36) as Part of the Registration Review of NAA

Dear Ms. Ozatalay,

The Environmental Protection Agency (EPA or the Agency) received a request from the AMVAC Chemical Corporation (AMVAC) to review the Generic Data-Call Ins (GDCI) issued for the registration review of 1-Naphthaleneacetic acid, its salts, ester, and acetamide, collectively referred to as naphthalene acetates and hereafter will be referred to as NAA. As you are aware, this case includes the following six active ingredients: naphthalene acetamide (PC code 056001), naphthalene acetic acid (PC Code 056002), potassium 1-naphthalene acetate (naphthalene acetic acid, potassium salt; PC Code 056003), ammonium 1-naphthalene acetate (naphthalene acetic acid, ammonium salt, PC Code 056004), sodium 1-naphthalene acetate (naphthalene acetic acid, sodium salt, PC Code 056007), and ethyl 1-naphthalene acetate (naphthalene acetic acid, ethyl ester, PC Code 056008). In the request, AMVAC asserts that in the registration review of NAA, a study generated with a test substance of one active ingredient supports the other active ingredients in the case.

The Agency has reviewed the request and determined that the studies outlined below in Tables 1 and 2 were necessary for the registration review of all the active ingredients included in the NAA registration review case. Therefore, these studies are required for all the technical products included in this case.

It is our understanding that Fine Agrochemical, LTD (Fine) holds technical registrations for 1-naphthaleneacetic acid technical sodium salt and 1-naphthaleneacetic acid technical potassium salt and therefore will be subject to the requirements listed in Tables 1 and 2. The Agency plans to issue a GDCI later this year to Fine for the additional studies deemed necessary for the registration review of NAA as listed below.

**Table 1**

<b>Guideline Number</b>	<b>Study Title</b>	<b>Original GDCI Number and PC Code</b>
<b>Table 1.1 Aquatic Toxicity Data</b>		
850.1400	Freshwater fish early-life stage (chronic)	GDCI-056001-1520 (NAD)
850.1075	Saltwater fish acute toxicity	GDCI-056001-1520 (NAD)
850.1010	Aquatic Invertebrate Acute (Freshwater)	GDCI-056001-1520 (NAD)
850.1300	Freshwater Invertebrate Life Cycle (Chronic)	GDCI-056001-1520 (NAD)
850.1035	Saltwater Invertebrate Life Cycle (Chronic)/Mysid Acute (Marine/Estuarine)	GDCI-056001-1520 (NAD)
850.4550	Cyanobacteria Toxicity	GDCI-056002-1521(NAA)
850.4500	Algal Toxicity (Freshwater – Navic)	GDCI-056002-1521(NAA)
850.4500	Algal Toxicity (Marine – Skeletonema)	GDCI-056002-1521(NAA)
<b>Table 1.2 Terrestrial Toxicity Data</b>		
SS-1311	Honey Bee Adult Acute Oral	GDCI-056002-1521(NAA)
SS-1313	Honey Bee Adult Chronic Oral	GDCI-056002-1521(NAA)
SS-1314	Honey Bee Larvae Chronic Oral	GDCI-056002-1521(NAA)
<b>Table 1.3 Residue Data</b>		
850.6100	Environmental Chemistry Methods and Validations	GDCI-056002-1521(NAA)
860.1340	Validation of CPS Residue Method	GDCI-056002-1521(NAA)
860.1520	Citrus Processing Study	GDCI-056002-1521(NAA)
860.1380 [also included 860.1000]	Storage Stability Study for Citrus Residues	GDCI-056002-1521(NAA)
<b>Table 1.4 Environmental Fate Data</b>		
835.1230	Absorption/Desorption	GDCI-056002-1521(NAA)
835.4100	Aerobic Soil Metabolism	GDCI-056002-1521(NAA)

Additionally, the toxicology data outlined in Table 2 below were also used in the risk assessments and are necessary to support registration. Although these studies were not included in the GDCI for registration review, they were submitted by AMVAC in 2005 and were used to support registration review.

**Table 2**

<b>Guideline Number</b>	<b>Study Title</b>	<b>PC Code</b>
<b>Table 2.1 Additional Toxicology Data</b>		
870.3700	Prenatal Development Toxicity Study in Rabbit	NAA, Na Salt (PC Code: 056007)
870.3700	Prenatal Development Toxicity Study in Rats	NAA, Na Salt (PC Code: 056007)
870.4200	80 Week Carcinogenicity Study in Mice	NAA, Na Salt (PC Code: 056007)

Please feel free to contact Anna Romanovsky of my staff if you have any questions. She may be reached by phone at (703) 347-0203 or by email at [romanovsky.anna@epa.gov](mailto:romanovsky.anna@epa.gov).

Sincerely,

*Kelly W. Sherman*

Kelly Sherman  
Chief  
Risk Management and Implementation Branch 3  
Pesticide Re-evaluation Division